

**T.E.S.T.**

March 27, 1995

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Mr. Bill Caton, Secretary  
Federal Communications Commission  
1919 "M" Street N W  
Washington, DC 20554

FCC  
FEDERAL COMMUNICATIONS COMMISSION  
EQUIPMENT AUTHORIZATION DIVISION

MAY - 9 1995

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COLUMBIA, MD

RE: Comments on NPRM (FCC 95-46), Report No. DC 95-28, ET Docket 95-19

SUBJECT: Accreditation of EMI Test Lab

This Document is a purposed requirement for EMI test laboratory accreditation. We **DO NOT WANT** mandatory NAVLAP regulations for independent test laboratory accreditation, there are more items wrong with NAVLAP than right. I offer these examples of the expensive considerations in time and money by NAVLAP accreditation.

1. The NAVLAP accreditation system is a duplication of existing FCC expertise and capabilities.
2. This NAVLAP system will not lower EMC testing costs - it will increase the unnecessary bureaucratic costs associated with the manufacturers existing product budget.
3. The NAVLAP program for EMI laboratories has a record and reputation for failure and lack of regulatory participation.
4. The domestic value of this program is costly and of no real value in the marketing and sale of a manufacturers product.
5. The international market does not require nor want the NAVLAP system - in fact, the FCC can accredit for BOTH the US and international recognition.
6. The NAVLAP scheme will increase complexity, bureaucracy and technical conflicts between them and the FCC.

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### THE ROLE OF THE FCC

The FCC is under staffed and under funded to meet its field objectives. The FCC has Field Operations Bureau offices in every state with an (EIC) Engineer In Charge who should be given the authority and funding necessary to monitor the test labs and issue appropriate fines for manufacturers noncompliance.

We, as an independent Test Laboratory, would like to recommend that the FCC design, fund and maintain an accreditation program specific for laboratories who must meet the current standards for EMI laboratory requirements - as an extension of the FCC laboratory.

Properly funded this program would allow each laboratory to become an arm of the FCC. By reducing the number of product applications directly to the FCC, the accredited laboratory would be in a position to test and label the manufacturers product on site, with a copy of the test certification report to the FCC. The FCC would still enjoy the appropriate filing fees and that cost would be filed with the product certification report.

This program would reduce the manufacturers market time and cost as well as the cost of test and filing time to the FCC.

EMI test labs are already under the control of the FCC and they alone, should continue to regulate and accredit **ALL TEST LABS**. The FCC should not delegate its responsibilities to any other organization - **ESPECIALLY NAVLAP!!!**

### **REGULATION OF EMI TEST LABS**

47 CFR places the manufacturer and supporting test lab as the responsible parties. If the FCC cannot handle the responsibility of regulating EMI and Telecommunications labs, then allow the FCC field operations bureau representatives to regulate the independent test labs. (page 39 of the Technical Information Seekers Guide)

The addition of an ineffective (no technical expertise) 3rd party (NAVLAP) program will add manufacturing and laboratory costs and reduce product effectiveness.

In addition, there would be an annual fee for FCC laboratory accreditation filing by each independent test laboratory. That fee would cover the cost of the annual laboratory inspection by the FCC field engineer (EIC).

### **SUMMARY**

The existing tests labs are not willing to accept the NAVLAP program as an enforcement vehicle to the FCC. We want to delay the impending acceptance of this docket until members of test laboratories can work with the FCC to develop a responsible, cost-effective program with which we can live. We suggest that:

1. Verification or no certification will increase nonconformance and invite EMC product violations.
2. The NAVLAP program does NOT function properly. No one wants it and - it is expensive and ineffective.

We propose:

1. To Develop a cost and time effective program which will benefit the manufacturer, independent test laboratory and the FCC - with ONE standard EVERYONE MUST meet. (FCC-B)
2. That Independent test laboratories meet specified criteria as an extension of the FCC laboratory, with appropriate fees (lab and client) to fund the FCC.
3. Properly fund the Field Offices for the purpose of initiating enforcement of violations and annual laboratory inspection and regulation.

It is our intention to aline ourselves with those who share the same convictions of integrity in an attempt to design and develop a cost-effective, efficient program with which we can ALL live.

Sincerely,

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Vice President